

**Ardmore Telephone Company, Inc.**

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

Date filed: January 21, 2019

Name of company(s) covered by this certification: Ardmore Telephone Company, Inc.

Form 499 Filer ID: 801078

Name of signatory: Karen Jackson-Furman

Title of signatory: Chief Operating Officer

I, Karen Jackson-Furman, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001(e) *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47.C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed:

A handwritten signature in purple ink, appearing to read "Karen Jackson-Furman", written over a horizontal line.

**Ardmore Telephone Company, Inc.**

**CPNI Usage Policy Statement**

Pursuant to Section 64.2009(e) of the Federal Communications Commission's rules this statement explains how Ardmore Telephone Company, Inc. operating procedures ensure compliance with Part 64, Subpart U, of the FCC's rules.

The company has policies procedures in effect that protect the usage and dissemination of CPNI. CPNI is only accessible by authorized personnel, who interface directly with customers, in the customary course of business.

The company has written instructions on accessing, usage, and protection of CPNI.

Company personnel that have access to CPNI have been trained in its use, and protection.

Call detail information is generally not available to customers. Call detail information is only provided pursuant to a written request validated by authorized management personnel.

Customers that access the company center in person must disclose a valid photo ID to access their call records. Telephone access is provided with name and address, and call detail information is only provided, with written consent.

Customers can access their call detail information on line by establishing a password to review their own records.

Procedures are in place for all marketing material prior to implementation to be reviewed by supervisory personnel and executives to ensure that CPNI data if used is properly protected, and if required, notice and authorization provided by its customers. No marketing activities were engaged in 2015 that used CPNI.

The company does not release CPNI information to third parties for marketing or any other purpose.

Employees that may misuse CPNI information are subject to disciplinary action as specified in the Company Employee Manual. An affirmation statement is required by all new employees that they have read the Manual and understand its terms.

There are no security CPNI breaches to report.